

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1, 2, 4, 7-40, and 42-43 are pending in the application, with claim 1 being the sole independent claim. Claims 1, 2, 4, 9-11, 15, 31, 38, 40, 42, and 43 are sought to be amended. Claims 3, 41 and 44, 46-48, 50-53, 55, 56, 58, and 79 have been canceled without prejudice or disclaimer. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

**Rejections Under 35 U.S.C. § 103**

The Examiner has rejected claims 1, 2, 3, 4, 7, 8, 9, 31 and 37 as being unpatentable under 35 U.S.C. § 103 over Paff (U.S. Patent No. 5,164,827) in view of Morota *et al.* (U.S. Patent No. 6,919,921) and further in view of Rosenberg *et al.* (U.S. Patent No. 6,128,006). Claims 10-16 and 32-36 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Paff in view of Morota *et al.* in further view of Rosenberg *et al.* in view of Heidmann *et al.* (U.S. Patent No. 6,057,833). Claims 17-28 were rejected under 35 U.S.C. 103(a) as being unpatentable over Paff in view of Morota *et al.* in further view of Rosenberg *et al.* and in view of Kanade *et al.* (U.S. Patent App. No. 2002/0118286). Claims 29 and 30 are rejected as being unpatentable over Paff in view of Morota *et al.* in further view of Rosenberg *et al.* in view of Kanade *et al.* in further view of Jain (U.S. Patent No. 5,729,471). Claims 38-43 were rejected under 35 U.S.C.

103(a) as being unpatentable over Paff in view Morota *et al.* in view of Rosenberg *et al.* in further view of Anderson (U.S. Patent No. 5,714,997). Claims 44, 46-48, 50, 51, 55, 56, 58 and 79 were rejected as being unpatenable over Paff in view of Jain. Finally, claims 52 and 53 were rejected under 35 U.S.C. § 103(a) as unpatenable in view of Paff in view of Jain and further in view of Anderson.

Applicants have amended independent claim 1 to recite "said monitoring unit also includes a storage device for storing said image and audio data from said plurality of cameras." Claim 1 has also been amended to recite the "monitoring unit overlays an output from each of said microphones in the same moment of time based on the speed of sound and the distance from each of said microphones to said target." The art applied by the Examiner does not teach or suggest storing image and audio data from a plurality of cameras and overlaying the output from each of the microphones as recited in claim 1. The Examiner suggests that "Anderson is capable of doing such an operation." However, being capable of doing something is a not equivalent to actually teaching it. The Examiner is simply using hindsight to make reject this element of Applicants' invention. Accordingly, Applicants submit that claims 1,2, 4, 7-40, 42 and 43 are in condition for allowance.

Claims 41 and 44, 46-48, 50-53, 55, 56, 58, and 79 have been canceled without prejudice or disclaimer. Accordingly, the rejection of these claims is rendered moot.

***Conclusion***

All of the stated grounds rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Robert Sokohl  
Attorney for Applicants  
Registration No. 36,013

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1100 New York Avenue, N.W.  
Washington, D.C. 20005-3934  
(202) 371-2600

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